

THE KARLIN LAW FIRM LLP
L. Scott Karlin (SBN 90605)
Michael J. Karlin (SBN 272442)
Rex T. Reeves (SBN 136842)
13522 Newport Avenue, Suite 201
Tustin, California 92780
Telephone: (714) 731-3283
Facsimile: (714) 731-5741
lsk@karlinlaw.com; mike@karlinlaw.com;
rex@karlinlaw.com

Attorneys for Defendant
C. W. BROWER, INC.
(sued herein as “CW BROWER INC.,
DBA STOP N SAVE GROCERS & LIQUORS”)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

LEE DOZIER,

Plaintiff,

vs.

C. W. BROWER INC., DBA STOP N SAVE
GROCERS & LIQUORS;

Defendants.

Case No. 1:23-cv-0184-JLT-EPG

**STIPULATION AND ORDER RE:
STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO INITIAL
COMPLAINT TO APRIL 7, 2023**

(ECF No. 11).

IT IS HEREBY STIPULATED by and between Plaintiff LEE DOZIER (“Plaintiff”) and Defendant C. W. BROWER, INC.(sued herein as “C. W. BROWER INC. DBA STOP N SAVE GROCERS & LIQUORS”) (“Defendant”) (Plaintiff and Defendant are referred to collectively herein as the “Parties”), by and through their attorneys of record, as follows:

1. Plaintiff agrees to give Defendant an extension of time to respond to the Complaint.

2. The original due date for Defendant to respond to the Complaint was on February 10, 2023. The Parties thereafter agreed to extend the due date to March 10, 2023 to investigate the case and facilitate settlement discussions, and filed a stipulation with the Court memorializing same.

3. It is agreed and stipulated that the new due date for Defendant to respond to the Complaint will be April 7, 2023. This extension of time is Defendant's second extension and does not alter the date of any event or deadline already fixed by Court order.

The Parties jointly request that the Court enter an Order consistent with the foregoing. Good cause exists for this extension for the purpose of reducing fees and costs, as counsel have engaged in significant settlement negotiations that have advanced to the stage of a settlement draft being prepared, and believe that the additional time that will be afforded by the requested extension of time will allow the Parties to finalize the settlement of this matter and avoid the incurring of unnecessary fees and costs by the Parties and the needless expenditure of judicial resources in connection with this matter.

DATED: 3/7/2023

LAW OFFICE OF RICK MORIN, PC

By: /s/ Richard Morin
Richard Morin, Esq.
Attorneys for Plaintiff
LEE DOZIER

DATED: 3/7/2023

THE KARLIN LAW FIRM LLP

By: /s/ Rex T. Reeves
Rex T. Reeves, Esq.
Attorneys for Defendant
C. W. BROWER, INC.
(sued herein as "C. W. BROWER INC. DBA STOP N
SAVE GROCERS & LIQUORS")

ORDER

Based on the parties' stipulation (ECF No. 11), IT IS ORDERED that Defendant shall have an extension to April 7, 2023, to respond to the complaint. Should the parties settle this case, they are directed to comply with Local Rule 160.

IT IS SO ORDERED.

Dated: **March 7, 2023**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE